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REMARKS

This is intended as a full and complete response to the Office Action dated April 4, 2005, having a shortened statutory period for response set to expire on July 4, 2005. Claims 1-38 are currently pending in the application. Please reconsider the claims pending in the application for reasons discussed below.

Claim Rejections Under 35 U.S.C. § 102(b)

The Examiner rejected claims 1, 33, 37, and 38 as being anticipated by *Simpson* (US 6,457,532). In response, Applicants have amended claims 1 and 33. Additionally, Applicants have cancelled claims 37 and 38.

As amended claim 1 includes the limitation of a bearing member disposed adjacent an end of the roller, wherein the bearing member is matable to the roller thereby preventing relative rotation therebetween. As amended, claim 33 includes the limitation of a bearing body disposed adjacent the roller, wherein the bearing body includes a profile matable with a corresponding profile formed on the roller. *Simpson* does not disclose a bearing member matable to the roller thereby preventing relative rotation therebetween or a bearing body having a profile matable with a corresponding profile formed on the roller. For these reasons, Applicants submit that claims 1 and 33 are in condition for allowance and respectfully request withdrawal of the § 102(b) rejection of claims 1 and 33. Additionally, claims 2, 3, 10 and 14 depend from amended claim 1, and these claims are allowable for at least the same reasons as claim 1.

The Examiner rejected claim 1 as being anticipated by *Clark* (US 2,627,891). In response, Applicants have amended claim 1.

As amended, claim 1 includes the limitation of a bearing member disposed adjacent an end of the roller, wherein the bearing member is matable to the roller thereby preventing relative rotation therebetween. *Clark* does not disclose a bearing member disposed adjacent an end of the roller, wherein the bearing member is matable to the roller thereby preventing relative rotation therebetween. Additionally, *Clark* does not disclose a piston that is radially extendable from the body in response to a fluid

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force. In contrast, *Clark* discloses a roller that is radially extendable by utilizing a mandrel. For these reasons, Applicants submit that claim 1 is in condition for allowance and respectfully request withdrawal of the § 102(b) rejection of claim 1. Additionally, claims 2, 10, 11 and 14 depend from amended claim 1, and these claims are allowable for at least the same reasons as claim 1.

The Examiner rejected claims 1, 37, and 38 as being anticipated by *Dixon* (US 1,412,278). In response, Applicants have amended claim 1. Additionally, Applicants have cancelled claims 37 and 38.

As amended, claim 1 includes the limitation of a piston that is radially extendable from the body in response to a fluid force. *Dixon* does not disclose a piston that is radially extendable from the body in response to a fluid force. In contrast, *Dixon* discloses rollers radially extendable by utilizing a mandrel. Additionally, *Dixon* does not disclose a bearing member disposed adjacent an end of the roller, wherein the bearing member is matable to the roller thereby preventing relative rotation therebetween. For these reasons, Applicants submit that claim 1 is in condition for allowance and respectfully request withdrawal of the § 102(b) rejection of claim 1. Additionally, claims 2 and 12-14 depend from amended claim 1, and these claims are allowable for at least the same reasons as claim 1.

Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner rejected claims 15 and 29 as being unpatentable over *Clark* '891 in view of *Simpson* '532 and *Clark* (US 2,499,630). In response, Applicants have amended claims 15 and 29.

As amended, claims 15 and 29 include the limitation of an upper bearing body disposed on the shaft adjacent an upper end of the roller and a lower bearing body disposed on the shaft adjacent a lower end of the roller. *Clark* '891 and/or *Clark* '630 does not disclose an upper bearing body disposed on the shaft adjacent an upper end of the roller and a lower bearing body disposed on the shaft adjacent a lower end of the roller. *Simpson* '532 also does not disclose a bearing body disposed on a shaft at each

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end of the roller. Rather, *Simpson* '532 discloses bearings (118) formed as integral end members of the radially slidable pistons. (See *Simpson* '532, col. 6, lines 58-63 and Figure 4) For these reasons, *Clark* '891 and/or *Simpson* '532 and/or *Clark* '630 can not be used to render claims 15 and 29 obvious. Applicants, therefore, submit that claims 15 and 29 are in condition for allowance and respectfully requests withdrawal of the § 103(a) rejection. Additionally, claims 4 and 5 depend from amended claim 1, claims 16-17 and 19 depend from amended claim 15 and claims 30, 34, and 35 depend from amended claim 29, and they are allowable for at least the same reasons as amended claims 1, 15, and 29.

The Examiner rejected claims 6-9, 18, 31-32, and 36 as being unpatentable over *Clark* '891 in view of *Simpson* '532 and *Clark* '630 as applied to claims 5, 15, 30, and 35 above, and further in view of the pre-grant publication to *Whang* (US 2003/0156769). Applicants respectfully traverse this rejection. Claims 6-9 depend from amended claim 1 and claim 18 depends from amended claim 15 and claims 31-32 depend from amended claim 29 and claim 36 depends from amended claim 33. As set forth above, *Clark* '891 and/or *Simpson* '532 and/or *Clark* '630 fail to teach or suggest all the limitations in claims 1, 15, 29, and 33. Similarly, *Whang* fails to teach or suggest all the limitations of claims 1, 15, 29, and 33. For this reason, neither *Clark* '891 and/or *Simpson* '532 and/or *Clark* '630 and/or *Whang* can be used to render claims 6-9, 18, 31-32, and 36 obvious. Applicants, therefore, submit that claims 6-9, 18, 31-32, and 36 are in condition for allowance and respectfully request withdrawal of the § 103(a) rejection.

The Examiner rejected claim 20 as being unpatentable over *Clark* '891 in view of the WO 93/24728 to *Simpson, et al.* In response, Applicants have amended claim 20. As amended, claim 20 includes the limitation of at least one bearing member disposed between the first roller and the second roller. As correctly indicated by the Examiner, *Clark* '891 does not disclose a plurality of rollers. *Simpson, et al.* does not disclose at least one bearing member disposed between the first roller and the second roller. For these reasons, *Clark* '891 and/or *Simpson, et al.* can not be used to render claim 20

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obvious. Applicants, therefore, submit that claim 20 is in condition for allowance and respectfully request withdrawal of the § 103(a) rejection. Additionally, claims 12 and 13 depend from amended claim 1 and claims 21-23 depend from amended claim 20, and they are allowable for at least the same reasons as amended claims 1 and 20.

The Examiner rejected claim 24 as being unpatentable over *Clark* '891 in view of WIPO '728 as applied to claim 20 above, and further in view of *Simpson* '532 and *Clark* '630. The Examiner also rejected claims 25-28 as being unpatentable over *Clark* '891 in view of WO 93/24728, *Simpson* '532, and *Clark* '630 as applied to claim 24 above, and further in view of *Whang* '769. Applicants respectfully traverse this rejection. Claims 24-28 depend from amended claim 20, and they are allowable for at least the same reasons as amended claim 20.

New Claims

Claims 39-41 have been added to better define aspects of the present invention. Applicants submit that no new matter was added. Applicants believe the references cited by the Examiner do not teach or suggest an expander tool comprising a body having a bore therethrough, at least one recess formed on an outer surface of the body, at least one slidable member disposed in the at least one recess, wherein the slidable member includes at least a portion disposed at either end thereof having an outer surface for substantially contacting an inner surface of the recess, the portions having sufficient width to substantially prevent tilting about an axis perpendicular to a longitudinal axis of the tool and a rotating member mounted on the slidable member, as recited in new claims 39 and 40. Additionally, Applicants believe the references cited by the Examiner do not teach or suggest an expander tool of claim 1, wherein the roller and the shaft are constructed and arranged on the piston at an angle relative to a longitudinal axis of the expander tool, as recited in new claim 41. Therefore, Applicants believe new claims 39-41 are in condition for allowance, and respectfully request allowance of the same.

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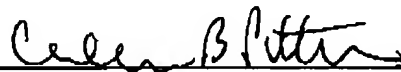
Conclusion

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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